

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
MARJORIE EVELYN BERRELL, :  
Debtor :  
 :  
JACK N. ZAHAROPOULOS, :  
STANDING CHAPTER 13 TRUSTEE, :  
Movant :  
 :  
vs. :  
 :  
MARJORIE EVELYN BERRELL, :  
Respondent : CASE NO. 1-23-bk-02142-HWV

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 14<sup>th</sup> day of April 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reason:

1. Trustee avers that Debtor's Plan is not feasible based upon the following:
  - a. The Plan is underfunded relative to claims to be paid.

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 14<sup>th</sup> day of April 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Dawn Marie Cutaia, Esquire  
Fresh Start Law, PLLC  
1701 West Market Street  
York, PA 17404

/s/ Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee